

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

ROBERT T. BROCKMAN

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Criminal No. 4:21-cr-00009

[PROPOSED] ORDER

For good cause shown, Mr. Brockman's Motion to Modify Protective Order is
GRANTED.

1. The Court hereby modifies the Protective Order as follows:

- a. The materials provided pursuant to this protective order may only be used for the specific purpose of preparing or presenting a defense in this matter, unless specifically authorized by the Court, and except that if any materials provided pursuant this protective order have also been made available to the government's attorneys in related civil litigation between the defendant and the government related to defendant's tax liabilities, those materials may also be used by the defendant for the specific purpose of preparing or presenting defendant's position in that related civil litigation.
- b. **IT IS FURTHER ORDERED** that defense counsel shall return materials subject to this protective order (including any copies) to the United States within 28 days after whichever event occurs last in time: dismissal of all charges against the defendant; defendant's acquittal; defendant's sentencing;

or the conclusion of any direct appeal in this criminal proceeding; dismissal of all related civil litigation between the defendant and the government regarding defendant's tax liabilities; final judgment in such civil litigation; or the conclusion of any direct appeal of a final judgment in such civil litigation.

2. **IT IS FURTHER ORDERED** that the government identify those materials that have been provided to the IRS in connection with its civil enforcement activities to allow Mr. Brockman timely access to those materials for use in the Collateral Civil Proceedings. If the government fails to identify such materials within seven days of the entry of this Order, Mr. Brockman is permitted to use all criminal discovery aside from grand jury testimony in the Collateral Civil Proceedings.

So ORDERED, this _____ day of _____, 2022.

George C. Hanks, Jr.
United States District Judge